



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

June 8, 2016

Leanne Meyer  
1515 Arapahoe St.  
Tower 1 Suite 1600  
Denver, Colorado 80202

**Re: Humphreys Compressor Station  
Notice of Violation (NOV)  
Air Permit  
Belmont County  
0607015007**

**Division of Air Pollution Control**

**Subject: Notice of Violation**

**Certified: 7013 2630 0000 3713 1823**

Dear Ms. Meyer:

On May 19, 2016 Ohio Environmental Protection Agency (Ohio EPA) inspected MarkWest Humphreys Compressor Station located in Belmont County on Johnson Ridge Rd. During the inspection, I was assisted by Aaron Morgan and Mike Kramer of Southwest Ohio Air Quality Agency, and Andrew Hall and Kerri Rogers of Ohio EPA. Ryan Sluss represented MarkWest during the inspection. The goal of our inspection was to determine your facility's compliance with Ohio's air pollution laws as found in Chapter 3704 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of Humphreys Compressor Station permit-to-install P0116619 issued on June 23, 2014. Our inspection included a review of company operations and the use of a Forward Looking Infrared (FLIR) camera and flame ionization detector (FID) to verify our findings. On May 27, 2016 Sandy Colegrove and Sean Stephenson returned to complete a follow-up inspection. The goal of our inspection was to determine if steps had been made to correct the findings from the May 19, 2016 inspection. Ryan Sluss, Justin Wiseman, Lisa Sendek and Jacob Primovic assisted Ohio EPA with the inspection.

**Findings**

Ohio EPA observed the following violations of Ohio's air pollution control laws and MarkWest- Humphreys Compressor Station permit terms and conditions. In order to bring your facility into compliance, we recommend promptly addressing these violations **within 14 days of your receipt of this letter**.

1. OAC rule 3745-31-05(A)(3)  
Permit term and condition C.3.b)(1)a.

*Install a VRU with a 100% capture and a minimum control efficiency of 98% of VOC emissions.*

- (a) **Violation:** It was determined that the VRU controlling emissions from storage tanks, emissions unit (EU) T007, was not operating in a manner to achieve the required capture and control efficiencies. This determination was confirmed through visual observations utilizing the FLIR. The FLIR indicated vapors being released to the atmosphere by a pressure relief valve that connects all five-400 bbl tanks. The tanks are permitted for 100% capture under normal operating conditions; therefore, the failure to achieve 100% capture is a violation of PTIO P0116619.
  - (b) On the follow-up inspection on May 27, 2016 the pressure relief valve had been replaced with a new electronic fisher pressure relief valve. The new valve is monitored and controlled electronically and will send out notifications when pressures become elevated in the tank and the valves open. This new system will allow MarkWest to monitor the valve and respond to, and report, any noncompliant venting in a timely manner. The previous valve did not have these capabilities. Therefore, based on the replacement of the valve and updated valve monitoring equipment it appears the violation referenced in 1(a) has been abated.
  - (c) **Violation:** MarkWest provided the VRU, pressure relief valve, and thief hatch set points on May 25, 2016. The documentation provided states that the pressure relief valve was set at 8oz. and the thief hatches were set at 12oz.; therefore, any pressure at or above 8oz. would open the pressure relief valve and any pressure at or over 12oz. would open the thief hatches. Pressures above the set points result in the valve opening and uncontrolled venting to occur. After a review of the VRU records provided on May 20, 2016 it was determined that pressures inside the tanks exceeded the set point for the pressure relief valve connecting all five tanks (T007) on the following dates: September 1, 4, 5, 6, 7, 8, 9, 11, 12, 13, 15, 18, 20, 21, 22, 24, 25, 27 and 28 of 2015; April 21 and 22, 2016; and May 10 and 25, 2016. Uncontrolled venting through the pressure relief valve does not achieve the required 100% capture and 98% control as required by PTIO P0116619 and is therefore a violation of the permit terms and conditions.
  - (d) **Requested Action:** Within 14 days upon receipt of this letter please provide a detailed description explaining the root cause of the leaks, including the location and the number of leaks, what caused the failure/leakage, the duration of the leaks, and quantification of the total emissions that have been released. If the issue has been corrected, provide confirmation that the leaks have been abated, documentation demonstrating that the collection system is achieving 100% capture, and describe the corrective actions MarkWest performed to correct the leaking storage tanks. If the tanks have not been repaired, please provide a compliance schedule that identifies the leaking units, how they will be repaired, and a timeframe of when the repairs will be complete.
2. OAC rule OAC 3745-15-06(B)  
Permit term and condition A.10.

*If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.*

*In the event that any emission source, air pollution control equipment, or related facility breaks down in such a manner as to cause the emission of air contaminants in violation of any applicable law, the person responsible for such equipment shall immediately notify the Ohio environmental protection agency district office or delegate agency of such failure or breakdown. If the malfunction continues for more than seventy-two hours, the source owner or operator shall provide a written statement to the director within two weeks of the date the malfunction occurred.*

- (a) **Violation:** Each pressure relief valve set point exceedance identified above in item 1(c) of this letter constitutes a malfunction that requires reporting in accordance with OAC rule 3745-15-06(B). MarkWest failed to report the above malfunctions and is in violation of PTIO P0116619 and OAC rule 3745-15-06(B).
- (b) **Requested Action:** Within 14 days upon receipt of this letter, please submit a written statement describing the malfunctions for each date identified above along with all the information required in OAC rule 3745-15-06(B). Also please include a description of the corrective actions MarkWest has taken, or will undertake, to ensure that malfunctions are reported in accordance with permit and rule requirements in the future.

### **Conclusion**

The Ohio EPA requests that MarkWest promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. **Within 14 days of receipt of this letter**, please provide documentation to Ohio EPA of the actions taken to resolve the violations cited above. If you have already resolved the violations listed above, thank you, and please provide documentation supporting compliance. If you have not yet addressed the violations, please submit a compliance plan on how the company plans to correct the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [sean.stephenson@epa.ohio.gov](mailto:sean.stephenson@epa.ohio.gov).

Failure to comply with Chapter 3704 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, MarkWest is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

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Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 3704 of the Ohio Revised Code.

Should you have any questions, please contact me by phone at 740-380-5275 or by email at [sean.stephenson@epa.ohio.gov](mailto:sean.stephenson@epa.ohio.gov).

Sincerely,



Sean Stephenson, ESII  
Ohio EPA – Division of Air Pollution Control  
Southeast District Office

SS/cb

cc: Justin Wiseman, MarkWest  
ec: Melisa Witherspoon  
Jim Kavalec, DAPC-CO  
Andrew Hall, DAPC-CO  
Michael Hopkins, DAPC-CO  
Brian Dickens, USEPA Region 5